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November 27, 2024

**VIA ECF**

Hon. John G. Koeltl  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Net Zero Logistics LLC v. Hailify, Inc.**  
**Case No.: 1:24-cv-04895**  
**Letter Motion Requesting Extension of Time to Submit Rule 26(f) Report and Other Deadlines**

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Dear Judge Koeltl:

This firm represents defendant Hailify, Inc. (“Defendant” or “Hailify”) in the above-referenced civil action commenced by plaintiff Net Zero Logistics LLC (“Plaintiff” or “Net Zero”) against Hailify (the “Action”). We write in light of pending settlement conferences and to request that Your Honor extend the deadline for the parties to submit their joint Rule 26(f) Report and extend all of the parties’ other deadlines in this action pending conclusion thereof.

Presently the parties are engaged in settlement conferences before Honorable Magistrate Judge Katharine H. Parker with an in-person settlement conference presently scheduled for January 28, 2025 at 5:00 PM EST. (See Dkt. 28.) If successful, the aforesaid settlement conference stands to resolve this matter. Additionally, the parties have agreed to this request and to extend their respective deadlines in this action until the settlement conference is concluded.

Accordingly, Hailify respectfully requests that the Court extend the deadline for the parties to submit their joint Rule 26(f) Report and extend all of the parties’ other deadlines in this action pending conclusion of said settlement conference. This is the first request for such an extension.

Respectfully Submitted,

*/s/ Dennis A. Amore*

Dennis A. Amore

Cc. All counsels via ECF

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*Application Granted. All deadlines are stayed pending the conclusion of settlement talks before MJD. In the meantime, the parties shall provide a status report by 1/30/25.  
So ordered. DR. Koeltl / U.S.D.J.  
11/29/24*